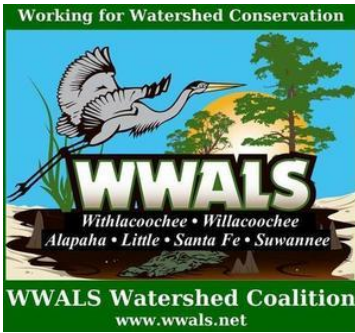


May 2, 2022



By Electronic Mail to:

Eric Cornwell, Program Manager, eric.cornwell@dnr.ga.gov
Stationary Source Permitting Program
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354
epdcomments@dnr.ga.gov

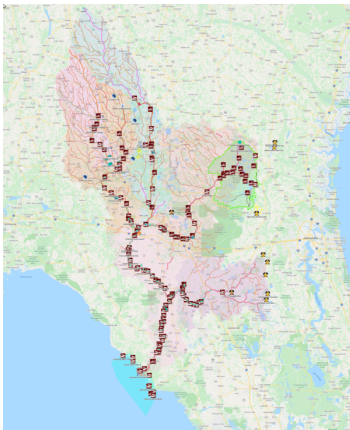


RE: WWALS Public Comments on Air Permit Application No. 28143 for Spectrum Energy Georgia, LLC

Dear Mr. Cornwell,



We remain concerned that EPD's approval of the Renewable Biomass Group's (RBG) wood pellet plant in Adel set a precedent for this application by, and draft permit for, Spectrum Energy Georgia, LLC (Spectrum).



We are further concerned that the comments we sent to EPD on November 19, 2021, do not seem to have been adequately addressed.

This draft permit has Environmental Justice (EJ) implications not only for Adel, a plurality minority community, in which EPD has approved one polluting pellet plant, and now entertains approving another. These pellet plants' hazardous emissions will not stay in Adel. When trees around the Okefenokee Swamp burned in 2007, the smoke traveled as far as 80 miles west to Quitman, putting some elderly folk in the hospital, including one of my relatives. The smoke also went north to Atlanta and south to Miami. Pellet plant hazardous emissions are statewide health risks for Georgia and Florida.

PO Box 88, Hahira, GA 31632
850-290-2350
wwalswatershed@gmail.com
www.wwals.net

Beyond Adel, both RBG and Spectrum, in addition to the Waycross pellet plant now owned by Enviva Pellets Waycross, LLC (Enviva), will probably draw wood from 75 miles around, from Tallahassee, Florida to the Okefenokee Swamp. Most of the population of this area is economically disadvantaged, and much of it is minority.

WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.

While RBG's CEO Craig Whitlock told the Adel City Council in September 2020 that RBG's plant would not burn whole trees, its EPD air quality application said it could. <https://wwals.net/?p=53580> Historically, woody biomass plants that start out with tops and stems end up burning or pelletizing whole trees.

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.

These pellet plants threaten flooding and topsoil loss through deforestation across a wide swath of south Georgia and north Florida. As you know, deforestation contributed to the record "700-year" floods of 2009 and 2013 that produced record sewage spills from the City of Valdosta and elsewhere.



Deforestation also promotes runoff of cattle manure into waterways. This problem is already a major focus of the WWALS volunteer water quality testing program. WWALS testing and water quality test results from Valdosta, Lowndes County, and several downstream Florida agencies have established that such *E. coli* contamination in the Withlacoochee River, whether from Quitman sewage spills or cattle manure runoff, has gone all the way down the Withlacoochee and Suwannee Rivers to the Gulf of Mexico. It is strongly suspected that *E. coli* found in water wells near the rivers during those contamination incidents is caused by such river contamination; further testing will eventually resolve that question. Meanwhile, river contamination risks the health of people swimming, boating, and fishing in the rivers. Further deforestation producing further such contamination is an EJ issue.

Thus this pellet plant would increase harmful emissions in Adel, and would have adverse effects far around on economically disadvantaged and minority populations, possibly ranging from flooding to topsoil loss to *E. coli* in rivers and wells due to sewage spills and cattle manure runoff.

Back in Adel, increased truck traffic around the plant would produce diesel fuel combustion emissions and increased traffic risk, also EJ concerns.

That is all in addition to the adverse climate change effects of the greenhouse gases emitted by the eventual burning of the wood pellets, even if that burning is in Europe. Already the Georgia peach crop fails many years because winters are not cold enough. The Florida citrus industry is in dire straits because of heat-induced diseases. Pine beetles abound in droughts in both states. Poor rural south Georgia and north Florida do not need more greenhouse gas sources driving faster temperature increases. This pellet plant is thus a major Environmental Justice issue.

The Narrative from Director Dunn to Spectrum says:

There are also comments from Environmental Integrity Project (EIP) and WWALS Watershed Coalition, Inc. that questioned the use of the emission factors in the application for various reasons, such as high control efficiency without detailed information for the control devices, use of after-control tested data as uncontrol emission factors, and so on. In reality, there is limited credible information available for pellet mill emission factors. Available data shows widely varying emission factors; therefore, the Division has determined that the permit will require that the facility conduct performance testing to validate all the emission factors provided in the application. These testing requirements are included in Section 6 of the permit.

Yet Enviva has similar plants in six U.S. states, including the one it bought in Waycross. There should be massive amounts of emission data available from those plants.

After it bought that Waycross plant, Enviva sent EPD Application No. 610193, which resulted in significant increases in many Enviva emission estimates. We recommend EPD require to revisit its Prevention of Significant Deterioration (“PSD”) applicability thresholds. We recommend EPD require Spectrum to use the emission estimation methods employed by Enviva in its re-evaluation of the Enviva pellet plant.

If EPD does not consider Enviva’s updated numbers for its Waycross pellet plant credible, why did EPD accept them?

For that matter, why did EPD *not* require such emission updates from the Waycross plant even before it was bought by Enviva? Was the Performance Testing of Section 6 of the current draft permit not required in the original Waycross pellet plant permit? If such testing was so required and there is still “*limited credible information available for pellet mill emission factors,*” why should EPD, or the EJ communities, or the general public, expect that Section 6 testing will be adequate for this proposed new pellet plant?

If there are no credible ways to estimate (as for Spectrum) or to measure (as for Enviva Waycross) emissions, EPD should not be issuing permits for such plants.

Please deny this Spectrum air quality permit application.

John S. Quarterman
Suwannee RIVERKEEPER®
/s
WWALS Watershed Coalition, Inc.